

Case 1:18-cr-00015-AKH Document 683 Filed 05/13/20 Page 1 of 18

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Joseph Sabella,
Petitioner,

vs

Criminal No: 1:18-cr-00015-AKH-3

United States of America,
Respondents

The Government has until
May 22, 2020 to respond.
A hearing shall take
place shortly after.

X

John S
5-14-2020

**MOTION FOR REDUCTION OF SENTENCE AND/OR
COMPASSIONATE RELEASE PURSUANT TO 18 USC § 3582(c) (1) (B)**

COMES NOW, Joseph Sabella, hereinafter known as petitioner, in pro se forma, respectfully submits the above motion for Reduction of Sentence and/or Compassionate Release under 18 USC 3582 (c)(1)(B) after Congress passed the First Step Act (2018) and the recently enacted Cares Act (2020). Petitioner has currently served almost one (1) year of his current sentence. Further, petitioner projected release date is October 23, 2025. In support thereof petitioner avers as follows:

1- On February 12, 2019, the defendant pleaded guilty, pursuant to the Plea Agreement, to conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d). (PSR ¶ 12). After grouping the offense levels of each Group pursuant to